

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK - MANHATTAN DIVISION

In Re: Case No. 22-10943-MEW

VOYAGER DIGITAL HOLDINGS, INC. and Chapter 11
VOYAGER DIGITAL, LLC,

Debtor(s).

REQUEST FOR SPECIAL NOTICE AND SERVICE OF COPIES

TO: UNITED STATES BANKRUPTCY JUDGE, THE DEBTOR(S), AND ALL INTERESTED PARTIES

PLEASE TAKE NOTICE that ALDRIDGE PITE, LLP submits this Request for Special Notice and Service of Copies, for Wells Fargo Bank, N.A. and hereby requests special notice of all events relevant to the above-referenced bankruptcy and copies of all pleadings or documents filed in relation to the above-referenced bankruptcy, including all pleadings or notices under Federal Rules of Bankruptcy Procedure, Rule 2002, the commencement of any adversary proceedings, the filing of any requests for hearing, objections, and/or notices of motion, or any other auxiliary filings, as well as notice of all matters which must be noticed to creditors, creditors committees and parties-in-interest and other notices as required by the United States Bankruptcy Code and Rules and/or Local Rules of the above-referenced bankruptcy court.

ALDRIDGE PITE, LLP, submits this Request for Notice and Service of Copies as agent for Wells Fargo Bank, N.A. and not as counsel of record.

ALDRIDGE PITE, LLP, requests that for all notice purposes and for inclusion in the Master Mailing List in this case, the following address be used:

Gregory A. Wallach
ALDRIDGE PITE, LLP
Fifteen Piedmont Center
3575 Piedmont Road, N.E.
Atlanta, GA 30305

Neither this Request for Special Notice nor any subsequent appearance, pleading, claim,

proof of claim, documents, suit, motion nor any other writing or conduct, shall constitute a waiver of the within party's:

a. Right to have any and all final orders in any and all non-core matters entered only after de novo review by a United States District Court Judge;

b. Right to receive service pursuant to Fed. R. Civ. P. 4 made applicable to the instant proceeding by Fed. R. Bankr. P. 7004. This Request for Special Notice shall not operate as a confession and/or concession of jurisdiction. Moreover, the within party does not authorize ALDRIDGE PITE, LLP, either expressly or impliedly through ALDRIDGE PITE, LLP's participation in the instant proceeding, to act as its agent for purposes of service under Fed. R. Bankr. P. 7004;

c. Right to trial by jury in any proceeding as to any and all matters so triable herein, whether or not the same be designated legal or private rights, or in any case, controversy or proceeding related hereto, notwithstanding the designation or not of such matters as "core proceedings" pursuant to 28 U.S.C. § 157(b)(2)(H), and whether such jury trial right is pursuant to statute or the United States Constitution;

d. Right to have the reference of this matter withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and

e. Other rights, claims, actions, defenses, setoffs, recoupments or other matters to which this party is entitled under any agreements at law or in equity or under the United States Constitution.

Dated: September 9, 2022

ALDRIDGE PITE, LLP

/s/ Gregory A. Wallach
Gregory A. Wallach
ALDRIDGE PITE, LLP
4375 Jutland Dr., Suite 200
P.O. Box 17933
San Diego, CA 92117-0933
SDNY # 5556683

ALDRIDGE PITE, LLP
Fifteen Piedmont Center
3575 Piedmont Road, N.E.
Atlanta, GA 30305
Telephone: (858) 750-7600
Facsimile: (619) 590-1385

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK - MANHATTAN DIVISION

In re

VOYAGER DIGITAL HOLDINGS, INC. and
VOYAGER DIGITAL, LLC,

Debtor(s).

Case No. 22-10943-mew

Chapter 11

PROOF OF SERVICE

I, Gregory A. Wallach declare that:

I am employed in the County of Fulton, Georgia. My business address is: Fifteen Piedmont Center, 3575 Piedmont Road, N.E., Atlanta, GA 30305. I am over the age of eighteen years and not a party to this cause.

On September 9, 2022, I caused the REQUEST FOR SPECIAL NOTICE AND SERVICE OF COPIES to be served by electronic means through the court's CM/ECF system or by placing true and correct copies thereof enclosed in a sealed envelope with postage thereon fully prepaid in the United States Mail, addressed as follows: SEE ATTACHED SERVICE LIST.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 9, 2022

/s/ Gregory A. Wallach
NYSD# 5556683

SERVICE LIST

DEBTOR(S)
(VIA U.S. MAIL)

Voyager Digital Holdings, Inc.
33 Irving Place
3rd Floor
New York, NY 10003

Voyager Digital, LLC
78 SW 7th Street
8th Floor
Miami, FL 33130

DEBTOR(S) ATTORNEY
(VIA ELECTRONIC NOTICE)

Joshua Sussberg
Kirkland & Ellis LLP
601 Lexington Avenue
New York, NY 10022
jsussberg@kirkland.com

DEBTOR(S) ATTORNEY
(VIA ELECTRONIC NOTICE)

Zachary R. Russell
Quinn Emanuel Urquhart & Sullivan
51 Madison Ave.
22nd Floor
New York, NY 10010
212-849-7531
Fax : 212-849-7100
Email: zacharyrussell@quinnemanuel.com

U.S. Trustee

U.S. Trustee
United States Trustee
Office of the United States Trustee
U.S. Federal Office Building
201 Varick Street, Room 1006
New York, NY 10014
(212) 510-0500

Counsel for U.S. Trustee

Richard C. Morrissey
Office of the U.S. Trustee
201 Varick Street, Room 1006
New York, NY 10014
(212) 510-0500
Fax : (212) 668-2255
Email: richard.morrissey@usdoj.gov